

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION**

<b>IN RE:</b>	)	
	)	
<b>DELIA PABON</b>	)	<b>Case No.: 1:18-04487 HWV</b>
	)	<b>Chapter 13</b>
<b>Debtor(s)</b>	)	
	)	
<b>NATIONSTAR MORTGAGE LLC</b>	)	
<b>Movant</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>DELIA PABON</b>	)	
<b>Respondent(s)</b>	)	
	)	
<b>CHARLES J. DEHART, III</b>	)	
<b>Trustee</b>	)	

**OBJECTION TO MOTION FOR RELIEF FROM STAY**

**TO THE HONORABLE JUDGES OF THE U.S. BANKRUPTCY COURT:**

**Debtor, through her attorney, Sean P. Quinlan, Esquire, hereby represents as follows:**

- 1. On or about October 23, 2018, the debtor filed a Chapter 13 Petition with this Court.**
- 2. The debtors plan as filed schedules Nationstar Mortgage LLC, as a First Mortgage holder on the debtors residential home located at 3057 Cape Horn Road, Red Lion, PA 17356, which regular mortgage payment were to continue to be paid direct and outside the plan by the debtors.**
- 3. On May 18, 2020 the Attorney for Nationstar Mortgage LLC, Leslie J. Rase, filed a Motion for Relief from Stay stating that the debtor was deficient on her post-petition mortgage payments. The debtors were contacted and we were informed that they had budget expenses that unexpectedly came up which prevented them from maintaining the required payments.**
- 4. The debtors have since the filing of the Motion made all payments to the mortgage company.**

**5. The debtor does not want to lose her home that she has worked very hard to maintain her mortgage payments.**

**6. For the above stated reasons, the debtor through Counsel, requests that Nationstar Mortgage LLCs Motion for Relief from Stay be denied.**

**WHEREFORE, Debtor, through undersigned, requests that this Honorable Court deny Nationstar Mortgage LLCs Motion for Relief from Stay.**

**Dated: 6/1/2020**

**/s/ Sean P. Quinlan, Esquire  
Sean P. Quinlan, Attorney for Debtors**